

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Jonathan M. Lilian

Debtor

APPLICATION

**CASE #: 13-23048-rdd
CHAPTER 7**

**AFFIRMATION IN SUPPORT OF MOTION TO VACATE ORDER PURSUANT TO 11
U.S.C. § 362(D) VACATING THE AUTOMATIC STAY GRANTED ON AUGUST 8, 2017**

To: Honorable Robert D. Drain
U.S. Bankruptcy Judge

I Aleksandra K. Fugate, an attorney duly admitted to practice law in this court, affirms the following to be true, under penalties of perjury:

1. I am an associate of Woods Oviatt Gilman, LLP, attorneys for Wells Fargo Bank, N.A. ("Secured Creditor"). I am fully familiar with the facts of this case and submit ~~this affirmation in support of the Secured Creditor's request for an Order to Vacate Order~~ pursuant to 11 U.S.C. § 362(d) vacating the Automatic Stay granted on August 8, 2017.

2. On August 8, 2017 the Secured Creditor obtained an Order Pursuant To 11 U.S.C. § 362(d) vacating the automatic stay (the "Order") as to real property located at 50 Quarry Lane, Bedford, NY 10506 (the "Subject Property"). A copy of the granted order is attached here to as Exhibit "A".

3. At this time it is requested that the Order be vacated as Jonathan M. Lilian ("Debtor") has since brought the loan current.

4. Secured Creditor requests that the Conditional order granted on January 17, 2017 be reinstated and the Debtor bound by the terms of the same. A copy of the granted order is attached hereto as Exhibit "B".

5. A copy of the purposed Order is attached as Exhibit "C".

WHEREFORE, Secured Creditor respectfully requests that this Court enter an Order to Vacate Order Pursuant To 11 U.S.C. § 362(D) Vacating The Automatic Stay granted on August 8, 2017 and further relief as the Court deems just and proper.

DATED: August 31, 2017
Rochester, New York

/s/ Aleksandra K. Fugate, Esq.
WOODS OVIATT GILMAN LLP
Aleksandra K. Fugate, Esq.
Attorneys for Secured Creditor
700 Crossroads Building
2 State Street
Rochester, New York 14614
Telephone: 855-227-5072